

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE NEXCEN BRANDS, INC.
SECURITIES LITIGATION

Master File No. 1:08-cv-04906-AKH

This document relates to: all actions

**LEAD PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR
(1) FINAL APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT,
(2) APPROVAL OF PROPOSED PLAN OF ALLOCATION, AND
(3) AN AWARD OF COUNSEL'S FEES AND REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE that on December 2, 2011 at 12:00 p.m. in Courtroom 14D of the United States District Court located at 500 Pearl Street, New York, NY, plaintiffs will and hereby do move the Court, the Honorable Alvin K. Hellerstein, for final approval of the proposed class action settlement, approval of the proposed plan of allocation and an award of counsel's fees and reimbursements of expenses.

This motion is based upon this notice of motion and motion, the accompanying memorandum of points and authorities, the accompanying declaration of Lisa M. Mezzetti in support of the motion, the exhibits attached thereto, and such argument and additional papers as may be submitted to the Court before and at the hearing on this motion.

Dated: November 1, 2011

Respectfully submitted,

/s/ Catherine A. Torell

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Lead Counsel for Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on November 1, 2011.

/s/ Catherine A. Torell